

The South Carolina State Conference of
the NAACP, et al v. Alexander, et al
CA No.: 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT D

*Senate Defendants and House Defendants' Motion
in Limine to Exclude Testimony of Plaintiffs'
Putative Expert Jordan Ragusa*

February 10, 2022
Deposition Transcript of
Jordan Ragusa

Jordan M. Ragusa , PhD
The South Carolina State Conference vs. McMaste,

February 10, 2022

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION
4 THE SOUTH CAROLINA STATE CONFERENCE
5 OF THE NAACP, and TAIWAN SCOTT, ON
6 BEHALF OF HIMSELF AND ALL OTHER
7 SIMILARLY SITUATED PERSONS,

8 Plaintiffs, Civil Action
9 vs. No. 3:21-cv-03302
10 HENRY D. McMASTER, et al.,
11 Defendants.
12 (Full Caption on Page 2)

13 DEPOSITION OF: JORDAN M. RAGUSA, PhD
14 (Appearing via Zoom)

15 DATE: February 10, 2022

16 TIME: 10:02 AM

17 LOCATION OF College of Charleston
18 THE WITNESS: Charleston, SC

19 REPORTED BY: Sandra K. Bjerke, RDR, CRR, CBC
20 (Appearing via Zoom)
21
22
23
24
25

1 Q. Okay. All right. So can you give me
2 any information as to whether this methodology
3 that's unique to you, okay, and I may -- I take it
4 this is a methodology that you developed to tackle
5 this particular project; is that right?

6 A. Yes.

7 Q. Okay. All right. So that methodology
8 has not attracted widespread acceptance within a
9 relative -- relevant scientific community, has it,
10 Doctor?

11 A. This very specific approach, no.

12 Q. Okay. All right. And I want to go
13 back to your modeling for a moment. Do you know if
14 any other experts have used the modeling that you
15 use as opposed to the methodology in redistricting
16 cases?

17 A. I don't.

18 Q. Okay. I believe that you mentioned --
19 and I'm going to mangle this name, okay, and maybe
20 you can help me, but you mention a gentleman named
21 Stephen Ansolabehere. Did I pronounce that name
22 right, if you know?

23 A. I don't know. I've heard it pronounced
24 Ansolabehere.

25 Q. Ansolabehere? Okay. All right. Are

1 because -- and maybe I'll ask the question a
2 different way. It hasn't been subject to peer
3 review or publication, to your knowledge; right?

4 A. To my knowledge, no.

5 Q. Okay. You can't tell me if there's any
6 way to account for known or potential error rate;
7 right?

8 A. That's correct.

9 Q. Okay. You can't tell me if there are
10 any existence or maintenance of standards
11 concerning its operation; right?

12 A. That's correct.

13 Q. And whether it's -- whether it's
14 attracted widespread acceptance within a relevant
15 scientific community. If it's unique to you, then
16 it hasn't; correct?

17 A. Correct.

18 Q. And that goes for all five -- excuse
19 me. All of your models, is that right, Doctor?

20 A. I believe that's fair, yes.

21 Q. Okay.

22 MR. MOORE: Can we take like a
23 five-minute break, please? I'm checking to see
24 what time our lunch is going to be here, and when
25 it's here I'm going to want to take like a